

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES
Antimicrobial Division

May 25, 2005

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: EMIL

DP Barcode: D317150

Reg. No. or File 5813-IL
Symbol

TGAI/Manufacturing-use Product ☐ **OR** **End-use Product** ☒

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APPLICANT: The Clorox Company

Action code: A54

Due date: 07/12/05

Product Formulation
Active Ingredient(s)

% by wt.

Sodium hypochlorite

0.0095

BACKGROUND:

The registrant, The Clorox Company, is submitting a data package for review in response to the EPA letter. The non-integrated end-use product, **EMIL**, cleans, deodorizes, and sanitizes.

FINDINGS:

1. The Product Chemistry Reviewer has received the following documents:
 - Confidential Statements of Formula (CSFs), dated 05/11/05 for the alternate formulations and the basic formulation.
 - A letter, dated 05/11/05.
 - A label, undated.
 - Justification for wider limits for sodium hypochlorite.
 - Justification for wider limits for [REDACTED]
2. The CSFs, dated 05/11/05, for the basic formulation, and the alternate (A01, A02, A03, & A04) formulations are revised.
3. The CSFs and the label have the same nominal.
4. The upper certified limits need correction for the inert, [REDACTED] for the basic formulation.

CONCLUSION:

The CSFs, dated 05/11/05, for the basic formulation, and the alternate (A01, A02, A03, & A04) formulations are acceptable (ref. AD SOP/CSF, revised 03/08/01). The CSFs and the label have the same nominal. The registrant wants to keep the upper certified limits, because of the manufacturing process. However, the registrant should be aware that column 14 of the CSF is not designed to identify the manufacturing process or the composition ratio in the formula. The Agency had created column 14 as a window to allow flexibility to whoever assays the product, and should be within the window range, regardless. The justification for a wider range, sodium hypochlorite and [REDACTED] are acceptable. The responses to the EPA letter are acceptable.